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January 21, 2021

Hon. Laura Taylor Swain
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Constantinescu, et al.*
Dkt. Nos.: 19-CR-651

Dear Judge Swain:

I am CJA counsel to Defendant Florian Martin. Mr. Martin is currently scheduled for a remote conference before Your Honor on February 5, 2021. I write to respectfully request a one-month adjournment of the scheduled conference date.

We continue to engage the government in plea negotiations and to review discovery. Mr. Martin, who remains in custody at the MCC New York, just gained access this week to a 10TB hard drive of discovery. We believe it is important for Mr. Martin to review this discovery so that he may participate in his own defense as well as the plea bargaining process. For these reasons, we are respectfully requesting a one-month adjournment.

I have spoken with the government, by AUSA Elizabeth Hanft, who consents to this request.

Mr. Martin consents to the exclusion of time from the speedy trial clock from today through whichever date is convenient to the Court.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone
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Cc: Elizabeth Hanft, Esq.
Assistant United States Attorney

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